

AO 91 (Rev. 02/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of Texas

FILED

2011 SEP -2 PM 4:28

CLERK US DISTRICT COURT
WESTERN DISTRICT OF TEXAS

United States of America)

v.)

Miracle Shantel Dyer (1))

Jermaine Dee Cooper (2))

Lenora Davis (3))

Defendant

Case No.

A-11-M-686

BY

DEPUTY

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

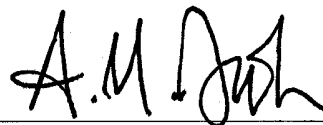
On or about the date of 08/29/2011 in the county of Hays in the Western District ofTexas, the defendant violated 18 U. S. C. § 371

, an offense described as follows:

Conspiracy to utter and possess a counterfeit and forged security

This criminal complaint is based on these facts:

see attached "Affidavit"

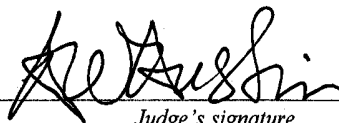
☒ Continued on the attached sheet.

Complainant's signature

Andrew M. Doohar, Special Agent - Secret Service

Printed name and title

Sworn to before me and signed in my presence.

Date: 09/02/2011

Judge's signature

City and state: Austin, Texas

ANDREW W. AUSTIN

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**MIRACLE SHANTEL DYER
JERMAINE DEE COOPER
LENORA DAVIS**

Defendants.

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CRIMINAL NO. _____

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Andrew M. Dooher, Special Agent, United States Secret Service, Austin, Texas, being duly sworn, depose and state the following:

1. I am a Special Agent of the United States Secret Service and have been so employed for over 20 years. I am currently assigned to the Austin, Texas, Resident Office. In this capacity, I have received extensive training and have experience in conducting investigations related to the production, passing, and distribution of counterfeit checks, counterfeit currency, and other forged instruments. In addition, I have extensive training and experience in conducting financial crime and fraud investigations to include access device fraud, bank fraud, mail fraud, wire fraud, computer fraud, money laundering, identity theft, false identification crimes, and counterfeiting of U.S. currency.

2. I submit this affidavit against Miracle Shantel DYER, Jermaine Dee COOPER, and Lenora DAVIS based on evidence showing a violation of 18 U.S.C. § 371, Conspiracy to Defraud by uttering and possessing a counterfeit and fraudulent security.

The Offense and Conspiracy

Based upon information that I have obtained during the course of the investigation, I have determined that the following occurred:

3. Miracle Shantel DYER, Jermaine Dee COOPER, and Lenora DAVIS were arrested by San Marcos police officers on August 29, 2011, based on their participation in a scheme to withdraw cash from stored value cards. DYER, COOPER, and DAVIS are suspected of perpetrating this fraud in Austin, Buda, and San Marcos as well as in other states. I subsequently contacted Corporal Loy Locke of the San Marcos Police Department and Detective Matt Conley of the Austin Police Department and learned the following:

4. On August 29, 2011, employees at the Wal-Mart store located at 690 Old San Antonio Road, Buda, TX, noticed some suspicious activity involving a black male (COOPER) and a black female (DYER). The black female went to a register and handed the cashier three Wal-Mart "MoneyCard" stored value/debit cards. The cashier accepted the stored value/debit cards and gave the woman approximately \$1500. A few minutes later, the black male went to the same cashier and gave her two additional stored value/debit cards. The cashier gave the black male approximately \$1000. Also noted at about this time, another unidentified black female used five counterfeit checks to buy five Wal-Mart MoneyCards totaling approximately \$2,500. The unidentified black female told the cashier that she was "from corporate" and presented the counterfeit checks. The checks were made payable to "WALMART MONEYCARD" in the

amount of \$503. The unidentified black female instructed the cashier to 'load' each Wal-Mart MoneyCard with \$500.00 (there is a \$3.00 service charge to purchase and load each MoneyCard). The cashier attempted to process the transaction as a check, but the store computer system would not allow the transaction to be completed. The black female then instructed the cashier to process the transactions as cash. The cashier complied and gave the unidentified black female approximately \$2500.

5. Recognizing the possible fraud, the management of the Buda Wal-Mart notified the management of the Wal-Mart store located at 1015 Hwy 80, San Marcos, TX, to be on the look-out for two black females and a black male who were conducting suspicious transactions involving Wal-Mart MoneyCards. Employees at the San Marcos Wal-Mart saw two black females (later identified as DYER and DAVIS) inside the store. DYER and DAVIS were conducting transactions in which they obtained cash from Wal-Mart MoneyCard stored value/debit cards.

6. DYER was conducting a transaction to withdraw \$391 from a MoneyCard when she appeared to recognize that she had raised the suspicions of Wal-Mart employees. DYER abruptly terminated the transaction before receiving any cash, and she left the stored value card at the register. The card that DYER left had an initial balance of \$790.50. A Wal-Mart employee followed DYER as she departed the store. DYER was then detained by San Marcos Police in an adjacent parking lot. DYER initially told the San Marcos Police that she had arrived on a bus from Oklahoma. She also claimed that she did not have any identification.

7. DAVIS completed a MoneyCard transaction and received \$495 from a cashier. She departed the store on foot and was followed by a Wal-Mart employee. DAVIS walked in the

direction of a red GMC Denali Yukon occupied by Jermaine Dee COOPER in the driver's seat. As DAVIS approached the vehicle, COOPER sped away and left DAVIS behind. DAVIS was detained by San Marcos police officers in the Wal-Mart parking lot. DAVIS told the officers that she did not know why a Wal-Mart employee was following her. She said that she had merely attempted to cash some gift cards that she had received from her mother. DAVIS claimed to have no identification and falsely identified herself to San Marcos Police as "Marquetta Taylor." She also provided them a fictitious date of birth of April 20, 1988.

8. San Marcos Police subsequently located the red GMC Denali Yukon driven by Jermaine Dee COOPER and conducted a traffic stop. COOPER was detained in handcuffs and consented to a search of his person. COOPER had \$2,369 in two large rolls of currency and a Wal-Mart MoneyCard stored value/debit card.

9. San Marcos Police advised COOPER of his rights regarding self-incrimination, and he was questioned in the back of a patrol car. COOPER admitted he was involved in fraudulent transactions at the Buda and San Marcos Wal-Mart stores. COOPER admitted being part of a group that obtained Wal-Mart MoneyCard stored value/debit cards through fraudulent means and then conducted transactions to convert the cards to cash. COOPER admitted he knowingly drove DAVIS and DYER to various locations to facilitate the fraud scheme and also knowingly conducted transactions with the stored value cards fraudulently obtained by DAVIS and DYER. COOPER further admitted he, DAVIS, and DYER had committed approximately 60 such fraudulent transactions.

10. DYER, DAVIS, and COOPER were charged with engaging in organized criminal activity and debit card abuse. DAVIS was also charged with failure to identify and giving false

information. At the time of her arrest, DYER had \$782 in cash and a cellular telephone , both of which were secreted in her bra. At the time of her arrest, DAVIS had \$903.16 in cash and 10 check stub receipts for checks payable to "WALMART MONEYCARD" in the amount of \$503.00.

11. Police conducted a search of the red GMC Denali Yukon operated by COOPER. Inside the vehicle, they discovered evidence of the ongoing fraud scheme: approximately 27 counterfeit checks made payable to "WALMART MONEYCARD" in amounts of \$503.00 and \$603.00; 56 check stub receipts for checks payable to "WALMART MONEYCARD" in amounts of \$503.00 and \$603.00; five Wal-Mart MoneyCard stored value/debit cards; \$8,044.79 in cash; numerous Wal-Mart receipts; a laptop computer and a printer; a Global Positioning System (GPS) navigation device; hotel room keys; a purse containing \$592.52 in cash and an Oklahoma identification card in DYER's name. In addition, officers found an apparent Wal-Mart employee identification card. The identification card is attached to a lanyard and reads as follows:

Walmart / MoneyCard
Chondra Jones
Money Card / Money Pak Specialist
District 2 Trainier
Bentonville Arkansas

At this time, it is unknown if the Wal-Mart identification found in the vehicle is genuine or fictitious.

12. San Marcos police reviewed the contents of the GPS navigation device found in the red GMC Denali operated by COOPER. The device had addresses of Wal-Mart stores in Texas, Oklahoma, Kentucky, Wisconsin, Illinois, Indiana, and Ohio entered into the GPS and was stored as "favorites" or as "recent searches".


13. On September 1, 2011, Austin Police Det. Matt Conley, San Marcos Police Corporal Loy Locke, and I reviewed the evidence seized by the San Marcos Police Department during the investigation and arrest of DYER, COOPER, and DAVIS. In addition, we conducted an interview of COOPER at the Hayes County Jail. COOPER was advised of his rights, which he waived. COOPER admitted knowingly participating in a scheme to defraud Wal-Mart. COOPER stated he knew that Wal-Mart MoneyCards were being fraudulently obtained and loaded by DYER and DAVIS; however, he claimed he did not know how this was being done. COOPER stated he drove DYER and DAVIS from store to store to conduct these illegal transactions and to redeem the cash which was 'loaded' onto the Wal-Mart MoneyCards. In addition, COOPER stated he knowingly presented fraudulently obtained Wal-Mart MoneyCards at various stores and conducted transactions to receive cash. COOPER said he had been recruited to participate in this fraud scheme by a black female known to him as "Ma." COOPER said he, along with DYER, DAVIS, "Ma," and others have perpetrated this fraud scheme in several states. COOPER said "Ma" and other black females participating in this fraud scheme refer to themselves as the "Little Women Crew." COOPER indicated "Ma" was present while

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the fraud was being perpetrated in Austin, Buda, and San Marcos. COOPER indicated "Ma" was in a different vehicle when COOPER was arrested along with DYER and DAVIS.



ANDREW M. DOOHER
SENIOR SPECIAL AGENT
UNITED STATES SECRET SERVICE

Sworn to before me this
2nd day of September, 2011



UNITED STATES MAGISTRATE JUDGE
WESTERN DISTRICT OF TEXAS